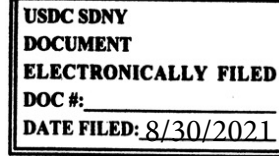


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August 23, 2021

APPLICATION GRANTED

Katharine H. Parker
Hon. Katharine H. Parker, U.S.M.J.
8/30/2021

VIA ECF

Hon. Katharine H. Parker
United States Magistrate Judge, Southern District of New York
Daniel Patrick Moynihan Courthouse
500 Pearl Street, Room 750
New York, New York 10007

Re: *Spectrum Dynamics Medical Limited v. GE*; Case No.: 18-cv-11386 (VSB)

Dear Magistrate Judge Parker:

We represent Plaintiff Spectrum Dynamics Medical Limited (“Plaintiff” or “Spectrum”) in the above-referenced action. On behalf of Plaintiff, we write pursuant to Rule III(d) of your Honor’s Individual Practices in Civil Cases to respectfully request permission to file under seal Plaintiff’s Opposition to Defendants’ Letter motion to Compel production and accompanying Exhibit A, filed today, August 23, 2021. Additionally, Plaintiff respectfully requests permission to separately file (via email) Exhibits B, B.1, C, C.1, D, D.1, E, E.1 and F, which contain Spectrum privileged information, for Your Honor’s review in camera.

Plaintiff requests leave to file the Opposition to Defendants’ Letter motion to Compel and Exhibit A under seal because the documents contain information designated as “Highly Confidential – Attorneys’ Eyes Only” under the Stipulated Confidentiality and Protective Order [D.I. 156] and to separately file Exhibits B-F via email, under Section 20.b of the Protective Order because these exhibits contain Spectrum attorney – client privileged materials.

Respectfully submitted,

/Neil F. Greenblum/

Neil F. Greenblum

cc: All counsel of record (via ECF)
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